Message

From: MacDonald, Alex@Waterboards [Alex.MacDonald@waterboards.ca.gov]

Sent: 4/7/2016 10:17:09 PM

To: Fennessy, Christopher [christopher.fennessy@Rocket.com]; Keller, Lynn [Keller.Lynn@epa.gov]; MacNicholl,

Peter@DTSC [Peter.MacNicholl@dtsc.ca.gov]

Subject: RE: Responses to Agency Comments - Area 40 RI Supplement

Chris:

For me, the only issue remains is the background values that were used. This is primarily a lead issue. The 2007 Background Study which was reviewed and approved by the Agencies. The analysis of background value for lead included the elimination of 5 samples as outliers. Three were for values that were high and two were lower values. It was agreed by the Agencies that the this was an appropriate action and the lead background value was set accordingly. Checking background lead values at a number of sites in the Sacramento Valley shows lead values ranting from 6 to 14 mg/kg. At Mather Field the background concentration is 6.08 mg/kg – 7.54 mg/kg at the 95% UCL.

We have not agreed that the revised values provided in the Boundary OU RI/FS documents are appropriate. We have made that known at Agency meetings and in our 1 July 2015 concurrence letter to USEPA regarding the Record of Decision for the Boundary OU. We have also made the same issue known on the Area 40 RI and HHRA documents. Even though this does not impact the cleanup decision on Area 40, we do not want the concept that we are agreeing to the revised background values provided initially in the Boundary OU documents perpetuated.

I will take one more gander at the document and see if there is anything else.

Alex

From: Fennessy, Christopher [mailto:christopher.fennessy@Rocket.com]

Sent: Tuesday, April 05, 2016 5:47 PM

To: Keller, Lynn (Keller.Lynn@epa.gov); MacDonald, Alex@Waterboards; MacNicholl, Peter@DTSC

Subject: Responses to Agency Comments - Area 40 RI Supplement

Hi Everyone – Attached are Aerojet Rocketdyne, Inc.'s responses to your comments on the Area 40 Remedial Investigation Supplement submitted in April 2015. Please review and comment. As soon as we resolve the responses, we will finalize the Area 40 RI and submit.

Thanks, Chris

Christopher M. Fennessy, P.E. Aerojet Rocketdyne, Inc.

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